Roberson, Sharon

From: Non-responsive based on revised scope
Sent: Tuesday, June 02, 2020 9:51 AM
To: Lindsey, Deborah
Cc: Non-responsive based on revised scope Graybill, Eric
Subject: R35754 - Validated Electronic Data for Weirton BOP Implosion
Attachments: R35754 EMSL04 LTR.pdf; R35754_EMSL04_Results_VAL.pdf; R356754_EMSL04_DVR.pdf

Deborah Lindsey
US EPA Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Deborah,

Attached to this message you will find electronic files containing the validation report and validated data for the Weirton BOP Implosion site, Case # R35754, SDG EMSL04. The validation of this case was completed by the Region III Environmental Services Assistance Team (ESAT).

Please contact ESAT's RPO, Eric Graybill by phone at 410-305-2665 or e-mail at Graybill.Eric@epa.gov if additional assistance is needed.

TO # 0002 TDF # 0520008

Non-responsive based on revised scope Non-responsive based on revised scope |Chemistry Data Manager| 410-305-3037 | Non-responsive based on revised scope
ICF | 701 Mapes Road, Fort Meade, MD 20755-5350

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Environmental Sciences Center
701 Mapes Road
Fort Meade, Maryland 20755-5350

DATE: 6/2/2020

SUBJECT: Region III Data QA Review

FROM: Eric Graybill
Region III ESAT RPO (3LS20)

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TO: DEBORAH LINDSEY
Hazardous Site Cleanup Division (HSCD)

Attached is the data validation report for the WEIRTON BOP IMPLOSION SITE site for DAS# R35754; SDG# EMSL04 completed by the Region III Environmental Services Assistance Team (ESAT) contractor, ICF International, under the direction of Region III LSASD.

If you have any questions regarding this review, please call Eric Graybill at (410)-305-2665.

Attachment

cc:

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TO: #0002 TDF: #0520008

ICF
ESAT Region 3
US Environmental Protection Agency Environmental Science Center
701 Mapes Road Ft. Meade, MD 20755-5350
Phone 410-305-3012

Date: May 19, 2020

To: ESAT Region 3 Project Officer

From: Non-responsive based on revised scope Non-responsive based on revised scope Non-responsive based on revised scope
Validator

Non-responsive based on revised scope Non-responsive based on revised scope
Reviewer

Subject: Inorganic Data Validation (S4VM)
Weirton BOP Implosion
R35754 EMSL04

Overview

This data package consisted of nineteen (19) soil samples, including two (2) field duplicate pairs, analyzed for asbestos utilizing polarized light microscopy (PLM).

Analyses were performed by EMSL Analytical, Inc. (EMSL). The samples were submitted to the laboratory directly by the sampling contractor. The laboratory indicated analyses were performed according to Test Method for the Determination of Asbestos in Bulk Building Materials, EPA/600/R-93/116 July 1993, with milling prep.

Data were validated according to the USEPA PLM Validation Process Guidelines for Asbestos Data Review and with guidance from the National Functional Guidelines for Inorganic Superfund Methods Data Review and are assigned the Superfund Data Validation Label S4VM (Stage_4_Validation_Manual).

The following validation narrative is an evaluation of laboratory reported data based on the electronic data package received by Region 3 on May 7, 2020.

An Electronic Data Deliverable (EDD) was provided by the laboratory. It was protected and could not be modified by the validator. No EDD is provided with this data validation report.

Summary

No data quality outliers or technical deficiencies were identified that would require rejection of sample results. Missing Refractive Index (RI) Liquid Calibration required estimation of sample results.

Minor Problem

The RI Liquid Calibration was not included in the data package. Visual Estimation and Point Count Limits of Quantification (LOQs) are estimated and have been qualified "UJ".

Notes

Mill preparation can reduce fiber size. While allowable to homogenize samples under the method, care must be taken to discontinue as soon as the material appears homogenous. This cannot be evaluated through the data package. No data were qualified based on this finding.

Asbestos fibers classified as chrysotile by the laboratory were detected in trace amounts in visual estimation of sample SS-12. The result for this sample was below the LOQ in point counting.

Data for field duplicate pairs SS-03/SS-04 and SS-13/SS-14 were comparable. No asbestos fibers were detected in either analysis.

For the laboratory duplicate analysis performed on sample SS-12, results were comparable (both results were below the LOQ in point counting). For the laboratory duplicate analyses performed on samples SS-01 and SS-07, no asbestos fibers were detected in any sample pair. No data were qualified based on laboratory precision.

Laboratory blanks associated with the samples in this SDG were free of asbestos.

Microscope alignment verification is present and shows proper alignment.

Reference sample analysis and fiber identification criteria for the visual examination trace results were reviewed by the validator and found to be accurate and consistent.

Glossary of Inorganic Data Qualifier Codes

Validation Qualifiers	In order of descending precedence. Only one of these qualifiers may apply to any result.
R	The data are unusable. The sample results are rejected due to serious deficiencies in meeting QC criteria. The analyte may or may not be present in the sample.
UJ	The analyte was analyzed for, but was not detected. The reported quantitation limit is approximate and may be inaccurate or imprecise.
U	The analyte was analyzed for, but was not detected above the level of the reported sample quantitation limit
B	The result is presumed a blank contaminant. This qualifier is used for drinking water samples only.
J	The result is an estimated quantity. The associated numerical value is the approximate concentration of the analyte in the sample.
J+	The result is an estimated quantity, but the result may be biased high.
J-	The result is an estimated quantity, but the result may be biased low.

R35754_EMSL04_042004637_03-05-20_soil_PLM.xlsm

National Asbestos Data Entry Spreadsheet (NADES) for Bulk & Soil Analysis by PLM

Lab Name: EMSL04
Lab Job No: 042004637
Analyzed by: Non-responsiv
Analysis date: 3/5/2020

Data Entry by: Non-responsive Data
Data Entry Date: 3/9/2020
QA by: Non-responsive
QA Date: 3/10/2020

Client Sample Number	Index Suffix Char.	Index Suffix No.	QA Type (a)	Lab Sample Number	Mineral Type (b)	OPTICAL PROPERTIES								Comments
						Morph	Fiber Color	Sign Elong. (+/-)	Pleoch (Y/N)	Angle Extinct.	Ref. Index α (parallel)	Ref. Index γ (perpendicular)	Biref.	
SS-01			Not QA	042004637-0001										AB 3/5/2020
SS-02			Not QA	042004637-0002										AB 3/5/2020
SS-03			Not QA	042004637-0003										AB 3/5/2020
SS-04			Not QA	042004637-0004										AB 3/5/2020
SS-05			Not QA	042004637-0005										AB 3/5/2020
SS-06			Not QA	042004637-0006										AB 3/5/2020
SS-07			Not QA	042004637-0007										AB 3/5/2020
SS-08			Not QA	042004637-0008										AB 3/5/2020
SS-09			Not QA	042004637-0009										AB 3/5/2020
SS-10			Not QA	042004637-0010										OA 3/5/2020
SS-11			Not QA	042004637-0011										OA 3/5/2020
SS-12			Not QA	042004637-0012	CH	W	C	+	N	P	1 551	1.557	L	OA 3/5/2020
SS-13			Not QA	042004637-0013										OA 3/5/2020
SS-14			Not QA	042004637-0014										OA 3/5/2020
SS-15			Not QA	042004637-0015										OA 3/5/2020
SS-16			Not QA	042004637-0016										OA 3/5/2020
SS-17			Not QA	042004637-0017										OA 3/5/2020
SS-18			Not QA	042004637-0018										OA 3/5/2020
SS-19			Not QA	042004637-0019										OA 3/5/2020
SS-01			LD	042004637-0001A										JP 3/5/2020 - Inter-analyst C
SS-07			LD	042004637-0007A										AB 3/5/2020 - Intra-analyst C
SS-12			LD	042004637-0019	CH	W	C	+	N	P	1 551	1.554	L	AG 3/5/2020 - Inter-analyst

R35754 EMSL04 042004637 03-05-20 soil PLM.xlsm

National Asbestos Data Entry Spreadsheet (NADES) for Bulk & Soil Analysis by PLM Visual Estimation

ANALYTICAL REPORT

FILE NAME R35754 EMSL04 042004637 03-05-20 soil PLM.xlsm

PROJECT INFORMATION				ANALYSIS INFORMATION				ABBREVIATED NOTES		
Site/Project Name:	R35754	Lab Name:	EMSL04	Method:	Analysis By:	Non-Reqd	Data Entry Date	3/9/2020	(a) Valid QA Types	(b) Valid Mineral Types AC - actinolite AM - amosite AN - anthophylite CH - chrysotile	(c) OM Description Standard Selections
State/Federal Site/Project Identifier:	R35754	Lab Job Number:	042004637		Analysis Date:	3/5/2020	QA by	Non-Reqd	Not QA - Not a QA sample	CR - crocidolite TR - tremolite WRTA - winchite/richterite/tremolite/actinolite OA - other amphibole	*Taconite*
Site/Project Identifier Code:	R35754	Date Received by lab:	02/21/20	EPA 600_VE	Data Entry by	Non-responsive	QA Date	3/10/2020	LD - Lab Duplicate	NAM - non-asbestis material OM - other mineral type (specify in "other mineral description" field)	*Erionite*

Enter percentage as a value, not a fraction (Example: Enter 50% as 50, not 0.50).

Client Sample Number	Sample Type	Index Suffix Char.	Index Suffix No.	QA Type (a)	Lab Sample Number	Sample Appearance	Ref Material	Base Mineral Type of Reference Material (b)	Actinolite (AC)			Amosite (AM)			Anthophyllite (AN)			Chrysotile (CH)			Crocidolite (CR)			Tremolite (TR)			winchite/richterite/ tremolite/actinolite (WRTA)			Other Amphibole (OA)			Non asbestos Material (NAM)			Other Mineral Type (OM)				Deviation?	Comments
									Qual	AC-AF (%)	AC-MF (%)	Qual	AM-AF (%)	AM-MF (%)	Qual	AN-AF (%)	AN-MF (%)	Qual	CH-AF (%)	CH-MF (%)	Qual	CR-AF (%)	CR-MF (%)	Qual	TR-AF (%)	TR-MF (%)	Qual	WRTA-AF (%)	WRTA-MF (%)	Qual	OA-AF (%)	OA-MF (%)	Qual	NAM-AF (%)	NAM-MF (%)	Qual	OM-AF (%)	OM-MF (%)	OM Type (c)		
SS-01	Soil			Not QA	042004637-0001	Brown-Non-Fi	Actinolite	AC	U			U			U			U			U			U			U			U			U			U				No	AB 3/5/2020
SS-02	Soil			Not QA	042004637-0002	Brown-Non-Fi	Actinolite	AC	U			U			U			U			U			U			U			U			U			U				No	AB 3/5/2020
SS-03	Soil			Not QA	042004637-0003	Brown-Non-Fi	Actinolite	AC	U			U			U			U			U			U			U			U			U			U				No	AB 3/5/2020
SS-04	Soil			Not QA	042004637-0004	Brown-Non-Fi	Actinolite	AC	U			U			U			U			U			U			U			U			U			U				No	AB 3/5/2020
SS-05	Soil			Not QA	042004637-0005	Brown-Non-Fi	Actinolite	AC	U			U			U			U			U			U			U			U			U			U				No	AB 3/5/2020
SS-06	Soil			Not QA	042004637-0006	Brown-Non-Fi	Actinolite	AC	U			U			U			U			U			U			U			U			U			U				No	AB 3/5/2020
SS-07	Soil			Not QA	042004637-0007	Brown-Non-Fi	Actinolite	AC	U			U			U			U			U			U			U			U			U			U				No	AB 3/5/2020
SS-08	Soil			Not QA	042004637-0008	Brown-Non-Fi	Actinolite	AC	U			U			U			U			U			U			U			U			U			U				No	AB 3/5/2020
SS-09	Soil			Not QA	042004637-0009	Brown-Non-Fi	Actinolite	AC	U			U			U			U			U			U			U			U			U			U				No	AB 3/5/2020
SS-10	Soil			Not QA	042004637-0010	Brown-Non-Fi	Actinolite	AC	U			U			U			U			U			U			U			U			U			U				No	OA 3/5/2020
SS-11	Soil			Not QA	042004637-0011	Brown-Non-Fi	Actinolite	AC	U			U			U			U			U			U			U			U			U			U				No	OA 3/5/2020
SS-12	Soil			Not QA	042004637-0012	Brown-Non-Fi	Tremolite	TR	U			U			U			trace			U			U			U			U			U			U				No	<0.25% CH - OA 3/5/2020
SS-13	Soil			Not QA	042004637-0013	Brown-Non-Fi	Tremolite	TR	U			U			U			U			U			U			U			U			U			U				No	OA 3/5/2020
SS-14	Soil			Not QA	042004637-0014	Brown-Non-Fi	Tremolite	TR	U			U			U			U			U			U			U			U			U			U				No	OA 3/5/2020
SS-15	Soil			Not QA	042004637-0015	Brown-Non-Fi	Tremolite	TR	U			U			U			U			U			U			U			U			U			U				No	OA 3/5/2020
SS-16	Soil			Not QA	042004637-0016	Brown-Non-Fi	Tremolite	TR	U			U			U			U			U			U			U			U			U			U				No	OA 3/5/2020
SS-17	Soil			Not QA	042004637-0017	Brown-Non-Fi	Tremolite	TR	U			U			U			U			U			U			U			U			U			U				No	OA 3/5/2020
SS-18	Soil			Not QA	042004637-0018	Brown-Non-Fi	Tremolite	TR	U			U			U			U			U			U			U			U			U			U				No	OA 3/5/2020
SS-19	Soil			Not QA	042004637-0019	Brown-Non-Fi	Tremolite	TR	U			U			U			U			U			U			U			U			U			U				No	OA 3/5/2020
SS-01	Soil			LD	042004637-0001	Brown-Non-Fi	Tremolite	TR	U			U			U			U			U			U			U			U			U			U				No	JP 3/5/2020 - Inter-analyst QC
SS-07	Soil			LD	042004637-0007	Brown-Non-Fi	Actinolite	AC	U			U			U			U			U			U			U			U			U			U				No	AB 3/5/2020 - Intra-analyst QC
SS-12	Soil			LD	042004637-0012	Brown-Non-Fi	Actinolite	AC	U			U			U			trace			U			U			U			U			U			U				No	<0.25% CH - AG 3/5/2020 - Inter-analyst QC

R35754_EMSL04_042004637_03-05-20_soil_PLM.xlsm

National Asbestos Data Entry Spreadsheet (NADES) for Bulk & Soil Analysis by PLM Point Count

Site or Project Name:	R35754
State/Federal Site or Project Identifier:	R35754
Site/Project Identifier Code:	R35754
Lab Name:	EMSL04
Lab Job No:	042004637
Date received by lab:	02/21/20
Analyzed by:	Non-respon
Analysis Date:	3/5/2020

Point Count Method: EPA 600_PC

Data Entry by:	Non-responsive
Data Entry Date:	3/9/2020
QA by:	Non-respon
QA Date:	3/10/2020

ABBREVIATED NOTES:

(a) Valid QA Types:

Not QA	Not a QA sample
LD	Lab Duplicate

(b) Valid Mineral Types:

AC	actinolite	WRTA	winchite/richterite/tremolite/actinolite
AM	amosite	OA	other amphibole
AN	anthophyllite	NAM	non-asbestos material
CH	chrysotile	OM	other mineral type
CR	crocidolite		(c)*OM Description Standard Selections:*
TR	tremolite		*Taconite*
			Erionite

Client Sample Number	Sample Type	Index Suffix ID	QA Type (a)	Lab Sample Number	Sample Appearance	Points Counted	Counts for each mineral type (b)										OM Type (c)	Validation Qualifier	Comments
							AC	AM	AN	CH	CR	TR	WRTA	OA	NAM	OM			
SS-01	Soil		Not QA	042004637-0001	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-02	Soil		Not QA	042004637-0002	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-03	Soil		Not QA	042004637-0003	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-04	Soil		Not QA	042004637-0004	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-05	Soil		Not QA	042004637-0005	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-06	Soil		Not QA	042004637-0006	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-07	Soil		Not QA	042004637-0007	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-08	Soil		Not QA	042004637-0008	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-09	Soil		Not QA	042004637-0009	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-10	Soil		Not QA	042004637-0010	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-11	Soil		Not QA	042004637-0011	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-12	Soil		Not QA	042004637-0012	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	<0.25% CH - OA 3/5/2020
SS-13	Soil		Not QA	042004637-0013	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-14	Soil		Not QA	042004637-0014	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-15	Soil		Not QA	042004637-0015	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-16	Soil		Not QA	042004637-0016	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-17	Soil		Not QA	042004637-0017	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-18	Soil		Not QA	042004637-0018	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-19	Soil		Not QA	042004637-0019	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-01	Soil		LD	042004637-0001A	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	JP 3/5/2020 - Inter-analyst QC
SS-07	Soil		LD	042004637-0007A	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020 - Intra-analyst QC
SS-12	Soil		LD	042004637-0012A	Brown-Non-Fibrous-Homogeneou	400	0	0	0	0	0	0	0	0	0	0		UJ	<0.25% CH - AG 3/5/2020 - Inter-analyst QC

R35754_EMSL04_042004637_03-05-20_soil_PLM.xlsm

National Asbestos Data Entry Spreadsheet (NADES) for Bulk & Soil Analysis by PLM Point Count

ANALYTICAL REPORT

FILE NAME: R35754_EMSL04_042004637_03-05-20_soil_PLM.xlsm

PROJECT INFORMATION		ANALYSIS INFORMATION			ABBREVIATED NOTES	
Site/Project Name	R35754	**Method**	**Analysis By**	[redacted]	(a) Valid QA Types:	(b) Valid Mineral Types:
State/Federal Site/Project Identifier	R35754	EPA 600_PC	**Analysis Date**	3/5/2020	**Not QA** - Not a QA sample	**AC** - actinolite **AM** - amosite **AN** - anthophyllite
Site/Project Identifier Code	R35754		**Data Entry by**	[redacted]	**LD** - Lab Duplicate	**CH** - chrysotile **CR** - crocidolite **TR** - tremolite
Lab Name	EMSL04		**Data Entry Date**	3/9/2020	(c) OM Description Standard Selections:	**WRTA** - winchite/richterite/tremolite/actinolite
Lab Job Number	042004637		**QA by**	[redacted]		**OA** - other amphibole **NAM** - non-asbestis material
Date Received by lab	02/21/20		**QA Date**	3/10/2020	*Taconite* *Erionite*	**OM** - other mineral type (specify in "other mineral description" field)

							Grav. Reduction		Concentration (%) for each mineral type (b)												
Client Sample_D	Sample Type	Index Suffix ID	QA Type (a)	Lab Sample_D	Sample Appearance	Points Counted	Ash fraction	Acid Fraction	AC	AM	AN	CH	CR	TR	WRTA	OA	NAM	OM	OM Type (b)	Total (%)
SS-01	Soil		Not QA	042004637-0001	Brown-Non-Fib	400	1.000	1.000												0 0
SS-02	Soil		Not QA	042004637-0002	Brown-Non-Fib	400	1 000	1.000												0 0
SS-03	Soil		Not QA	042004637-0003	Brown-Non-Fib	400	1 000	1.000												0 0
SS-04	Soil		Not QA	042004637-0004	Brown-Non-Fib	400	1 000	1.000												0 0
SS-05	Soil		Not QA	042004637-0005	Brown-Non-Fib	400	1 000	1.000												0 0
SS-06	Soil		Not QA	042004637-0006	Brown-Non-Fib	400	1 000	1.000												0 0
SS-07	Soil		Not QA	042004637-0007	Brown-Non-Fib	400	1 000	1.000												0 0
SS-08	Soil		Not QA	042004637-0008	Brown-Non-Fib	400	1 000	1.000												0 0
SS-09	Soil		Not QA	042004637-0009	Brown-Non-Fib	400	1 000	1.000												0 0
SS-10	Soil		Not QA	042004637-0010	Brown-Non-Fib	400	1 000	1.000												0 0
SS-11	Soil		Not QA	042004637-0011	Brown-Non-Fib	400	1 000	1.000												0 0
SS-12	Soil		Not QA	042004637-0012	Brown-Non-Fib	400	1 000	1.000												0 0
SS-13	Soil		Not QA	042004637-0013	Brown-Non-Fib	400	1 000	1.000												0 0
SS-14	Soil		Not QA	042004637-0014	Brown-Non-Fib	400	1 000	1.000												0 0
SS-15	Soil		Not QA	042004637-0015	Brown-Non-Fib	400	1 000	1.000												0 0
SS-16	Soil		Not QA	042004637-0016	Brown-Non-Fib	400	1 000	1.000												0 0
SS-17	Soil		Not QA	042004637-0017	Brown-Non-Fib	400	1.000	1.000												0 0
SS-18	Soil		Not QA	042004637-0018	Brown-Non-Fib	400	1 000	1.000												0 0
SS-19	Soil		Not QA	042004637-0019	Brown-Non-Fib	400	1.000	1.000												0 0
SS-01	Soil		LD	042004637-0001A	Brown-Non-Fib	400	1.000	1.000												0 0
SS-07	Soil		LD	042004637-0007A	Brown-Non-Fib	400	1.000	1.000												0 0
SS-12	Soil		LD	042004637-0012A	Brown-Non-Fib	400	1.000	1.000												0 0

EMSL ANALYTICAL, INC.
200 ROUTE 130 NORTH
CINNAMINSON, NJ 08077
PHONE: (800) 220-3675
FAX: (856) 858-4960

March 10, 2020

Non-responsive based on revised scope
Non-responsive based on revised scope

Techlaw, Inc.
139 Peninsula Street
Wheeling, WV 26003
(304)230-1230
Non-responsive based on revised scope
Non-responsive based on revised scope
Non-responsive based on revised scope@TechLawInc.com

Re: **Narrative: PLM EPA/600/R-93/116 with Milling Prep; EMSL Order: 042004637, Case #R35754**

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On February 21, 2020, EMSL Analytical, Inc. in Cinnaminson, NJ received nineteen (19) soil samples for asbestos content analysis via PLM EPA/600/R-93/116 with milling. All samples were received via FedEx under Chain of Custody #3-022020-124148-0001 from Techlaw, Inc. The samples were received in good condition and were logged in following normal lab procedures.

PLM EPA/600/R-93/116 with Milling Prep

The samples were dried prior to being placed in the puck mill. The milled samples were analyzed via Polarized Light Microscopy (PLM) using the procedures from the PLM EPA 600/R-93/116 method. All data was reported on a percent asbestos basis. Per the EMSL SOP method, any sample having asbestos content (visual estimation) ranging from <1 to 10% was subject to a 400 point count. The limit of quantification for this method is <0.25

QC Performed

Two inter-analyst and one intra-analyst QC analyses were completed with acceptable results. Quality Control for this project was performed in compliance with EMSL's Quality Assurance Manual.

I certify that this data package is in compliance with the terms and conditions of the contract, both technically and for completeness, for other than the conditions detailed above. In addition, I certify, that to the best of my knowledge and belief, the data as reported are true and accurate. Release of the data contained in this data package has been authorized by the Laboratory Manager or their designee, as verified by the following signature.

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3/10/20
Date

Senior Scientist – Special Projects
EMSL Cinnaminson, NJ

ESAT DATA VALIDATION EVALUATION CHECKLIST
Contract # EP-W-13-023

TDF #: 0520008	Revision: 0	Case #: R35754	SDG: EMSL04
Site Name: Weirton BOP Implosion			
Parameter(s): Asbestos			
Method(s): PLM EPA/600/R-93/116			
Laboratory: EMSL			
Reviewer: [redacted]		Date Submitted to EPA: 6/1/2020	
EPA RPM/OSC: Deborah Lindsey		Number of hours spent on review: 6	
cc: [redacted] (Tech Law Inc)		Number of Samples/Aliquots: 19 / 19	
Validation Level/Stage: IM2/S4VM		EDD: NO	

CRITERIA	YES	NO	COMMENTS
Format according to Region III protocol	☒	☐	
Clarity of report	☒	☐	
Qualifiers applied correctly	☒	☐	
Consistency between narrative and data summary form(s)	☒	☐	
Error-free transcription	☒	☐	

EFFICIENCY OF CONTRACTOR

Approval recommended for current submission	☒	☐	
Time spent on review is reasonable	☒	☐	
Technical Evaluation	3.8		[redacted]

ESD OVERSIGHT DATES	TPO	Oversight	ESAT
Received at EPA	6/1/2020		
Oversight assigned	6/1/2020		
Oversight received		6/2/2020	
Oversight completed		6/2/2020	
Feedback given	6/2/2020		
Mailed to RPM			

Data Validation Checklist – Asbestos PLM

TDF #: 0520008	Case/DAS #: R35754
Site Name: Weirton BOP Implosion	SDG #: EMSL04
Program: ☐ CLP ☒ Tier IV ☐ Other	DV Type: ☐ Org ☐ Ino ☐ HiRes ☐ Rad ☒ Asb
Parameter: Asbestos	DV Regional Level: ASB
SOW/Method: PLM EPA/600/R-93/116	DV Stage: S4VM
Laboratory Code: EMSL	Reviewer: Non-responsive based on revise Non-responsive based on revise

Due Date: 6/1/2020

General

CRITERIA	CHECK	COMMENTS
EPA Oversight Checklist		
TDF #	☒	
Case #	☒	
SDG #	☒	
Site Name	☒	
Laboratory	☒	
EPA OSC/RPM	☒	
CC: (Contractors)	☒	
Validation Level/Stage	☒	
Parameter	☒	
Number of Samples/Aliquots	☒	
Narrative		
Report Header	☒	
Report Footer	☒	
Overview		
Laboratory	☒	
Analytical method	☒	
Analytical services program	☒	
NFG reference	☒	
Validation level	☒	
Data package receipt date	☒	
Criteria		
Qualifier list	☒	
Appendix A		
Regional COC/ARF	☒	
Appendix B		
Laboratory narrative/Excerpts	☒	
Appendix C		
EXES report/Supplemental	☒	

General Comments:

Reviewed By: Non-responsive based on revised scope Non-responsive based on revised scope Non-responsive based on revised scope Date: 5/21/20

Data Validation Checklist – Asbestos PLM

TDF #: 0520008	Case/DAS #: R35754
Site Name: Weirton BOP Implosion	SDG #: EMSL04
Program: ☐ CLP ☒ Tier IV ☐ Other	DV Type: ☐ Org ☐ Ino ☐ HiRes ☐ Rad ☒ Asb
Parameter: Asbestos	DV Regional Level: ASB
SOW/Method: PLM EPA/600/R-93/116	DV Stage: S4VM
Laboratory Code: EMSL	Reviewer: Non-responsive based on revise Non-responsive based on revise

Technical

Section	Check	Comments
Overview	☒	
Matrix and # of samples	☒	
Field QC samples	☒	
Method	☒	
Summary	☒	
Major problems	☒	
Minor problems	☒	Missing data
Notes	☒	
Blank contaminants	☒	
Field Duplicates	☒	
Field / Lot Blanks	☒	
SSRs/Form Is	☒	
EDD	☐	

DV Item	Check	Qualifier Applied	Comments
Sample Receipt	☒		
Sample Preparation	☒		
Microscope Alignment	☒		
Refractive Index Liquid Calibration	☒		
Fiber Identification Criteria	☒		
Blank Analysis	☒		
Reference Sample Analysis	☒		
Replicate Analysis	☒		
Point Counting	☒		

General Comments:

Reviewed By: Non-responsive based on revised scope Non-responsive based on revised scope _____ Date: ___6/1/20____